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March 7, 2014

VIA Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**RE: Expression of Interest
Next Generation Network Experiments in Rural America
Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

Pursuant to the *Technology Transitions Order*,¹ Public Service Wireless, Inc., d/b/a Public Service Data Wireless ("PSW") hereby submits this expression of interest to deploy robust broadband to unserved, high-cost and very high-cost rural areas as part of the Federal Communications Commission ("FCC" or "Commission") Next Generation Network Experiments in Rural America Program (the "Program").

I. Project Overview and Background

PSW is a commercial wireless carrier that provides voice telephony and fixed and mobile broadband services in southern Georgia. As explained in greater detail below, PSW proposes to deliver broadband to high-cost and very high-cost rural areas by expanding its wireless network, and further extending fiber optic facilities into extremely rural, unserved areas in Georgia.

Depending on the rules ultimately adopted for the Program, and subject to additional engineering and business considerations, PSW anticipates that it will partner with its affiliate, Flint Cable TV ("Flint"), for the proposed project. Among other things, Flint owns and operates a fiber optic network in Georgia and provides transport services.² PSW anticipates that as part of the proposed project, Flint will extend its fiber network into the proposed service area in order to provide high capacity backhaul for PSW broadband services. PSW anticipates that its affiliate, Public Service Towers, will construct and manage any new towers required for PSW's deployment of its wireless broadband infrastructure.

II. Proposed Service Area

Subject to receipt of funding pursuant to the Program, PSW proposes to provide broadband to locations in Clay, Randolph, Stewart, and Webster counties Georgia that currently lack broadband Internet

¹ *Technology Transitions et al.*, GN Docket No. 13-5 *et al.*, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014) ("*Technology Transitions Order*").

² Flint also provides voice telephony and broadband services in south Georgia and is separately submitting an expression of interest to expand its network to provide broadband to other unserved areas in rural Georgia.

access at speeds of 3 Mbps downstream/768 kbps upstream. Specifically, PSW proposes to serve the unserved locations in the census blocks eligible for funding in the census tracts listed in Attachment A. By deploying services in these census blocks, PSW would make high-speed broadband service available to approximately 2,300 previously unserved locations.

PSW has applied for status as an eligible telecommunications carrier ("ETC") in some of its current service areas, and if awarded funding for the proposed project, would apply for ETC designation in the proposed service areas.

Windstream is the incumbent local exchange carrier in the service area in which PSW proposes to expand its network to provide broadband services.

III. Proposed Technology and Network

PSW plans to deploy a mobile and fixed wireless network utilizing and the Long Term Evolution ("LTE") air interface. This technology is ideally suited for providing broadband service to rural areas because of its ability to provide last-mile broadband service over significant distances. PSW anticipates that Flint would extend its fiber network in the proposed service area to provide backhaul for PSW's wireless broadband network.

IV. Proposed Services

PSW proposes to provide voice and broadband services in the proposed service areas. PSW expects to offer speeds of 5 Mbps downstream and 1 Mbps upstream throughout the service area. PSW anticipates offering broadband service for approximately \$40 per month, in addition to any necessary set up and equipment fees.

V. Estimated Cost and Deployment Schedule

PSW anticipates that it would request one-time funding of approximately \$15 million for the proposed project. This estimate is subject to modification and refinement based on additional engineering and design, and the ultimate rules and procedures adopted for the Program. At this time, PSW estimates that the project could be completed within 18-24 months of receipt of funding.

VI. Conclusion

The proposed project would provide for the cost-efficient deployment of broadband in extremely rural unserved areas by leveraging existing network infrastructure, utilizing cost-effective wireless infrastructure, and connecting the locations served by fixed wireless facilities over a fiber network. The proposed project would provide the FCC with valuable data about the ability to provide broadband in a rural area using a fixed wireless LTE network.

If you have any questions or would like to discuss the project described in this expression of interest, please contact the undersigned or our FCC counsel, Greg Whiteaker, at greg@hermanwhiteaker.com, 202-600-7274.

Respectfully submitted,



E. Kelly Bond
President

ATTACHMENT A

Proposed Census Tracts for PSW Expression of Interest Next Generation Network Experiments in Rural America *Connect America Fund*, WC Docket No. 10-90

Clay County, Georgia

Census Tract
13061960300

Randolph County, Georgia

Census Tract
13243790100
13243790200

Stewart County, Georgia

Census Tract
13259950100
13259950400

Webster County, Georgia

Census Tract
13307960100
13307960200